

HON. MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE DIVISION

JALINN WIGGINS,

Plaintiff,

v.

LYFT, INC. a foreign corporation; LYFT,  
INC., dba Lyft Washington, inc., a  
foreign corporation; SEYDINA GUEYE  
and JANE DOE GUEYE, individually  
and the marital community comprised  
thereof,

Defendants.

No.: 2:24-cv-01440 MJP

STIPULATED MOTION AND ORDER  
TO EXTEND TIME TO DISCLOSE  
EXPERT WITNESSES

NOTED ON THE MOTION  
CALENDAR ON DATE FILED AS A  
SAME DAY MOTION PURSUANT TO  
7(d)(1)

**STIPULATION**

Defendants Seydina Gueye and Jane Doe Gueye respectfully requests a 30-day extension of the initial deadline to disclose reports from expert witnesses under FRCP 26(a)(2). Plaintiff Jalinn Wiggins consents and agrees to this request.

Defendants Gueye seek this additional time in order to depose Plaintiff and select experts in accord with Plaintiff's testimony. Defendants first request for Plaintiff's deposition was made on June 3, 2025. Defendant made stipulated requests and subpoenas of records on March 10, 2025; however, responses are still outstanding

1 for Associated EMG Physicians; Sellwood Chiropractic Clinic; and employment  
2 records from AMG Healthcare. Defendants Gueye respectfully ask for this 30-day  
3 extension in order to fully evaluate the Plaintiff's claims and select experts.

4 Accordingly, there is good cause under Federal Rule of Civil Procedure 6(b) and  
5 local Civil Rule 10(g) for a 30-day continuance of the deadline to provide reports from  
6 expert witnesses under FRCP 26(a)(2).

7 The parties, through their counsel request and stipulate to the following  
8 proposed extension of the deadline in the Court's Order Setting Trial Date & Related  
9 Dates.  
10

Event	Original Deadline	New Deadline Requested
Reports from expert witness under FRCP 26(a)(2) due	June 16, 2025	July 16, 2025

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12  
13  
14 The parties have also discussed and agreed that, as a condition to Plaintiff  
15 consenting to Defendants' request for additional time to disclose expert witnesses,  
16 this stipulated request does not serve as a basis for a continuance of Plaintiff's  
17 pending motion for summary judgment on the issues of his past medical special  
18 damages and Defendants' affirmative defenses, which is set to be heard on June 27,

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2025. Defendant is not precluded from opposing the motion for summary judgment  
in part on the fact that discovery has not been completed.

DATED: June \_\_\_\_\_, 2025

MALONEY LAUERSDORF  
REINER, PC

By: /s/ *Katie D. Buxman*  
Katie D. Buxman, WSBA #32867

Attorneys for Defendants Gueye

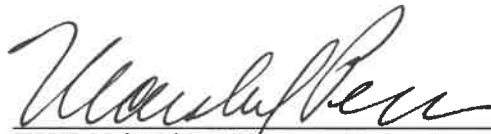
DAVIS LAW GROUP, PS

By: /s/ *David M. Reeve*  
David M. Reeve, WSBA #48405

Attorneys for Plaintiff Wiggins

**ORDER**

IT IS SO ORDERED this 6, day of June, 2025.

  
THE HONORABLE MARSHA J. PECHMAN

## CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2025, I served the foregoing STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANTS GUEYE TO DISCLOSE EXPERT WITNESSES on the following parties at the following address:

David Reeve Davis Law Group, PS 2101 4 <sup>th</sup> Ave. #1030 Seattle, WA 98121 P: 206-727-4000 F: 206-727-4001 <a href="mailto:david@davislawgroupseattle.com">david@davislawgroupseattle.com</a> <i>Of Attorneys for Plaintiff</i>	
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\_\_\_\_\_ by mailing a copy thereof, placed in a sealed envelope addressed as listed above and deposited in the United States mail at Portland, Oregon, and that postage thereon was fully prepaid.

☒ by electronic service through the court's eFiling system. Service was accomplished at the party's email address as recorded on the date of service in the eFiling system.

\_\_\_\_\_ by facsimile transmission to the fax number shown above.

☒ by email transmission to the email address shown above.

\_\_\_\_\_ by hand delivering a copy thereof, to the address listed above.

MALONEY LAUERSDORF REINER, PC

By Katie Buxman

Katie D. Buxman WSBA #32867

Email: [kb@mlrlegalteam.com](mailto:kb@mlrlegalteam.com)

Of Attorneys for Defendants Gueye